

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-1 Please provide Verizon's 1999, 2000 and 2001 annual reports to shareholders and Verizon's 1999, 2000 and 2001 Forms 10-Q.

**REPLY:** Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Verizon MA responds to this request as follows:

Verizon has no annual shareholder reports and Forms 10-Q for 1999 because the Company was not formed until after the 1999 fiscal year. Because Verizon's 2000 and 2001 reports are voluminous, a copy will be made available for inspection at the Company's offices at 125 High Street, Boston, Massachusetts, at a mutually agreeable time. Those documents are publicly available by accessing Verizon's Investor Relations Web site at:

<http://investor.verizon.com/financial/quarterly/index.html>

for the annual reports to shareholders, and

<http://investor.verizon.com/SEC/index.html>

for the quarterly Forms 10-Q.

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**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-2 Page 2, Lines 10-13: Does Verizon contend that the FCC is not adequately addressing current (post September 11, 2001) security concerns through the Homeland Security Policy Council, Network Reliability and Interoperability Council, and any other FCC dockets and/or initiatives? Please provide all relevant documents and analyses.

**REPLY:** No. Likewise, the Department's initiatives in investigating in this proceeding whether and to what extent any collocation security policies should be strengthened to safeguard the telecommunications networks in Massachusetts are reasonable and appropriate in light of the events of September 11, 2001.

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**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-3 Page 2, Lines 10-13: Does Verizon contend that the Department is better suited to address issues of national security than the FCC? If so, why? Please provide all relevant documents and analyses.

**REPLY:** Not necessarily. Verizon MA does not contend that the FCC's and the Department's initiatives are mutually exclusive. See also Verizon MA's Reply to Sprint-VZ 2-2.

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**D.T.E. 02-8**

**Respondent:** Peter Shepherd

**Title:** Director

**Respondent:** Lawrence R Craft

**Title:** Manager

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-4 Page 2, lines 18-20: Please provide all studies, analyses, documents and other support for the statement that "greater 'foot traffic' in central offices" potentially exposes the "network infrastructure" to a greater degree of risk. Please describe the "network infrastructure" to which Verizon is referring (Verizon's, CLECs', or both)? Please list, by CLLI, name and location, the Verizon MA buildings that house network facilities where there is customer "foot traffic."

**REPLY:** No such documents exist. It is a logical conclusion that the potential risk of inadvertent or deliberate harm to the network infrastructure would increase in collocated central offices ("COs") where a greater number of non-Verizon employees have access to the facilities. Likewise, this would increase the number of possible perpetrators whom Verizon would need to investigate when a security violation occurs in a collocated CO. The network infrastructure to which Verizon MA's Panel Surrebuttal Testimony refers includes the following: switching equipment, transmission circuit equipment, common channel signaling systems, distribution frames and cross-connections systems, power plant, operating support systems, HVAC, wiring, lines, circuits and trunking facilities within the CO. See Verizon MA's Reply to AL-VZ 1-1 for a list of COs with collocated carrier customers.



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**Respondent:** Lawrence R. Craft

**Title:** Manager

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-5 Page 3, lines 16-21: Please list and describe any specific security breaches that Verizon's proposal will eliminate? Please provide all relevant documents, studies and analyses.

**REPLY:** No such documents exist. The types of security breaches that may be minimized or prevented by adopting Verizon MA's collocation security proposal are included, but not limited to, those violations described in Verizon MA's Reply to AG-VZ 1-1. See also Verizon MA's Reply to Sprint-VZ 2-4.

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**Respondent:** Lawrence R. Craft

**Title:** Manager

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-6 Page 4, line 2: Please quantify, by risk factor, how much each of Verizon's proposals will reduce "these risks", and specify each individual risk to which Verizon is referring (*e.g.*, establishing separate entrances with separate space will reduce theft by 30%). Please provide all relevant documents, studies and analyses.

**REPLY:** No such documents exist. See Verizon MA's Reply to Sprint-VZ 2-4.

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**D.T.E. 02-8**

**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-7 Page 5, lines 4-6: Please provide all documents that support the statement that "The Department's objective is to be prepared for events that *may* occur in Massachusetts."

**REPLY:** See Verizon MA's Panel Direct Testimony, pages 1-2, citing to page 7 of the Department's January 24, 2002, Order.

VZ # 165



**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Lawrence R. Craft

**Title:** Manager

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-8 Page 5, Lines 6-11: Please provide all documents studies and analyses that support the statement that "Limiting access to certain critical buildings and to critical areas that should not be accessed by other carriers is the most effective and efficient means 'to safeguard telecommunications networks from tampering . . .'"

**REPLY:** No such documents exist. See Verizon MA's Replies to Sprint-VZ 2-4 and AL-VZ 3-1.

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**D.T.E. 02-8**

**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-9 Page 8, lines 5-6; Page 10, Lines 1-2: Is "no change" required in existing collocated "selected, highly sensitive security risk" central offices? Please explain why or why not and provide all supporting documents and analyses.

**REPLY:** With the exception of the single cageless collocation arrangement in an unsecured, unseparated space in Hopkinton, MA, Verizon MA proposes no change to its current procedures in collocated central offices ("COs") unless the CO is declared a critical office by the Department. Verizon MA proposes that existing physical collocation arrangements in Massachusetts COs designated as "critical" be converted to virtual collocation only. The documents explaining and supporting these distinctions are Verizon MA's Panel Direct and Surrebuttal Testimonies.

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**D.T.E. 02-8**

**Respondent:** Lynelle Reney

**Title:** Director

**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-10 Page 11, lines 6-7: Please list, by Verizon MA central office and CLLI code, all Verizon-MA cageless collocation sites "in areas that cannot be physically separated from Verizon MA's equipment areas" where Verizon MA proposes to eliminate all cageless collocation?

**REPLY:** Verizon MA has previously responded that there is only one CO, in Hopkinton, where Verizon MA is providing a cageless collocation arrangement in an area that cannot be physically separated and secured from Verizon MA's equipment. The applicable CLLI code is HPTNMAHR See also Verizon MA's Panel Surrebuttal Testimony (pages 9-10) and Verizon MA's Replies to AL-VZ 1-9, AL-VZ 1-21 and Conversant-VZ 1-20.

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**D.T.E. 02-8**

**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-11 Page 14, lines 5-9: Please specify the exact number and location of "critical central offices as available only for virtual collocation." Please describe the criteria for selecting these "critical central offices." If the Department grants, "the last step in Verizon MA's proposed security plan," when will Verizon MA implement the plan, when and how will it determine the costs of implementing the plan, and how will Verizon apportion the costs of implementing the plan among CLECs? Please provide all relevant documents, studies and analyses.

**REPLY:** The requested information regarding the exact number and locations of "critical" central offices is not available, and would be determined by the Department as stated in Verizon MA's proposed collocation security plan. Some factors that should govern the determination of critical COs are stated in Verizon MA's Panel Surrebuttal Testimony (pages 14-16). If the Department grants this proposal, Verizon MA would agree to implement the conversions from physical collocation arrangements to virtual collocation arrangements as soon as practicable following the Department's determination of the designated critical COs. Verizon MA would need to coordinate this effort with each collocated carrier having existing physical collocation arrangements in those critical COs. Since these would be in-place administrative conversions, the conversion is treated like a rearrangement or relocation of a physical collocation enclosure whereby Verizon MA would bear costs of relocating the enclosure in accordance with the attached applicable tariffs. *See e.g.*, DTE MA No.17, Part E, Section 2.2.8 or Tariff F.C.C. No. 11, Section 28.1.5(C).



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**D.T.E. 02-8**

**Respondent:** Lynelle Reney

**Title:** Director

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-12 Page 14, lines 16-17: For 1997, 1998, 1999, 2000, 2001 and 2002 (year to date), please provide for each year the number of additional personnel of other carriers accessing "these locations" by Verizon MA central office, CLI and/or other locations, and identify "these locations" as the term is used at page 14, line 17 of Verizon's surrebuttal testimony.

**REPLY:** See Verizon MA's AL-VZ 1-1. Verizon MA does not track the information in the form requested. Rather, Verizon MA's statement that additional carrier personnel access the Company's central offices ("COs") is based on the fact that the number of physical collocation arrangements in Massachusetts COs has increased significantly since 1997. For example, in early 1997, there were three carriers in 14 COs with 22 provisioned collocation arrangements. As of April 2002, there were 45 carriers in 131 central offices with 781 provisioned collocation arrangements. In addition, since 1999, Verizon MA has issued in excess of 15,000 ID cards to collocating carriers and their vendors in Massachusetts, and has issued over 6500 access cards for entry into Verizon MA COs.

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**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-13 Page 14, lines 17-19: Please provide all documents, studies and analyses that support the statement that "the increased number of additional personnel of other carriers accessing these locations increases the opportunity or chance that inadvertent or intentional actions could harm those critical network facilities." Please identify, by location and CLLI code, "those critical network facilities" to which Verizon MA is referring in this statement.

**REPLY:** See Verizon MA's Reply to Sprint-VZ 2-4 and Sprint-VZ 2-11.

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**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-14 Page 14, lines 19-20: Please provide all documents, studies and analyses that support the statement that "These critical offices require the additional degree of security that eliminating physical collocation would provide." Please identify, by central office location and CLLI code, "these critical offices" to which Verizon MA is referring in this statement.

**REPLY:** See Verizon MA's Panel Direct Testimony, pages 39-40, and Panel Surrebuttal Testimony, pages 15-16. See also, Verizon MA's Reply to Sprint-VZ 2-11.



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**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-15 Page 17, lines 3-6: Please list, by Verizon MA central office and CLI code, the "limited number of central offices deemed to be 'critical' to overall network functionality, national security, the public safety, health, welfare and economic interest of the general public."

**REPLY:** See Verizon MA's Reply to Sprint-VZ 2-11.

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**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-16 Page 27, lines 1-2: Please provide all documents, studies, analyses, court and regulatory decisions and citations that support the statement that “[s]ecurity and operational considerations are reasonably a part of the technical feasibility equation.”

**REPLY:** See Verizon MA’s Panel Direct Testimony, page 11; see also 47 C.F.R. §51.321(e)...

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**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-17 Page 27, lines 8-10: Please provide a copy and citation of the Department's Order or ruling that "physical collocation arrangements generally should be in separated, secured space."

**REPLY:** See the attached Department order in D.T.E. 98-21 (Covad/Bell Atlantic Arbitration), pages 1-13.

VZ # 175

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-18 Page 27, lines 13-15: Please provide a copy and citation of all orders and/or rulings of the FCC, Department, courts and/or other entities that state that "the Department may under federal standards determine whether and to what extent security concerns constitute a technical feasibility limitation on physical collocation in particular cases."

**REPLY:** See Verizon MA's Reply to Sprint-VZ 2-16.

VZ # 176

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-19 Page 27, lines 16-18: Has Verizon petitioned the FCC for a waiver of the FCC's collocation rules? If so, please provide all relevant documents, including Verizon's waiver petition. If not, please explain why Verizon has not filed such a petition with the FCC and indicate if and when Verizon MA or any affiliate of Verizon MA plans to do so.

**REPLY:** No. An FCC waiver is not required because under 47 C.F.R. §51.321(e) the state commission (*i.e.*, the Department) would determine whether physical collocation is not practical.

VZ # 177

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-20 Page 29, lines 16-18: Please provide all "cost data or other concrete evidence of harm" that demonstrates that the cost of implementing Verizon's proposal "outweighs" any anti-competitive harm or disruption of CLECs' access to collocation facilities.

**REPLY:** Throughout Verizon MA's Panel Direct and Surrebuttal Testimonies and in its discovery responses, Verizon MA has stated the need to take preventive steps in collocated offices to minimize and ultimately prevent potential security violations that could harm the network infrastructure in Massachusetts. Verizon MA's collocation security proposal is a reasonable approach to achieve that objective. As indicated in Verizon MA's Reply to Sprint-VZ 2-11, and its Panel Surrebuttal Testimony (pages 17-19, 29-31), there is no basis for carriers' claims that anti-competitive harm, increased service disruption or substantial added costs for collocated carriers would result if Verizon MA's proposal were adopted.

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**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-21 Page 30, lines 1-2: If "Verizon MA's proposed measures are intended to apply to all collocating carriers, not just CLECs, please describe how Verizon MA would apply each of its proposed security measures to Verizon MA. Please clarify, by type of carrier and specific examples, what Verizon MA means by "all collocating carriers, not just CLECs." Please provide, for each of Verizon MA's central offices in which there are collocated carriers, the square footage of the collocated space, they type of collocated carrier (ISP, CAP, IXC, CLEC, etc.), and the type of collocation arrangement(s) (*e.g.*, expanded interconnection, floor space lease, physical collocation, virtual collocation).

**REPLY:** Verizon MA's proposal addresses security concerns relating to the location of and access to carrier collocated space in Verizon MA's central offices and remote terminals by carriers. Verizon MA would apply those security measures to all collocated carriers, regardless of whether they operate as competitive local exchange carriers (CLECs), interexchange carriers (IXCs), competitive access providers (CAPs), Alternative Local Transport providers (ALTs), Commercial Mobile Radio Service providers (CMRS), etc. See also Verizon MA's Replies to AL-VZ 1-1 and Conversent-VZ 1-1(a) for the number and type of collocating carrier arrangements, respectively, in each of Verizon MA's collocated central offices.

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**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Sprint Communications Company L.P.'s, Set #2

**DATED:** June 20, 2002

**ITEM:** Sprint-VZ 2-22 Page 31, lines 1-2: Please provide a copy of the provisions of Verizon MA's contract with its union pertaining to employee background checks.

**REPLY:** Verizon MA's contracts with the unions do not cover provisions pertaining to employee background checks.

VZ # 180